

**FILED**

6-5-07  
DEC 05 2007

NA

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

**MICHAEL W. DOBBINS**  
**CLERK, U.S. DISTRICT COURT**

No. **07CR 799**

UNITED STATES OF AMERICA )

v. )

JU WEN ZHOU, a/k/a "Goi," et al. )

Honorable Nan R. Nolan

MOTION TO SEAL CRIMINAL COMPLAINT

The UNITED STATES OF AMERICA, by PATRICK J. FITZGERALD, United States Attorney for the Northern District of Illinois, moves to seal the contents of the criminal complaint in the above-captioned case. In support of this motion, the government states as follows:

1. The criminal complaint in this case charges 21 defendants with the offense of conspiracy to distribute and possess with intent to distribute controlled substances, in violation of 21 U.S.C. § 846 and 18 U.S.C. § 2.

2. The government presently plans to execute the arrest warrants issued for 13 of the defendants during the early morning hours of Thursday, December 6, 2007.

3. As further described in the criminal complaint, this case involves multiple defendants, some of whom are foreign nationals or have ties to foreign nations. In addition, this case involves other subjects who may be involved in the subject offenses.

4. Thus, if the filing of the criminal complaint became known to the defendants prior to the government's execution of the arrest warrant, the defendants (or other subjects) might flee the jurisdiction or otherwise try to obstruct, defeat or avoid prosecution for the charged offenses.

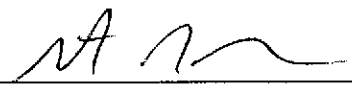
5. This Court has authority to seal these materials under appropriate circumstances. See *Nixon v. Warner Communications, Inc.*, 435 U.S. 589, 598 (1978); *In Re Sealed Affidavit(s) to Search Warrants*, 600 F.2d 1256 (9<sup>th</sup> Cir. 1979); *In Re September 1971 Grand Jury*, 454 F.2d 580 (7<sup>th</sup> Cir. 1971), *rev'd on other grounds*; *United States v. Webbe*, 791 F.2d 103, 106 (8<sup>th</sup> Cir. 1986).

WHEREFORE, the United States respectfully requests this Court to enter an order placing the criminal complaint under seal until 10:00 a.m. on December 6, 2007.

Respectfully submitted,

PATRICK J. FITZGERALD  
United States Attorney

By:

  
TIMOTHY J. CHAPMAN  
Assistant United States Attorney  
219 S. Dearborn Street, 5th Floor  
Chicago, Illinois 60604  
(312) 353-1925